

## REMARKS

In view of the foregoing amendments and the following remarks, reconsideration and early allowance of this application is respectfully requested.

Claims 1-16 were pending in this application. Claim 1 has been amended to more particularly define Applicants' invention, and claim 2 has been cancelled without prejudice. Claim 14 has been amended to correct an informality. No new matter has been introduced.

Claim 14 stands objected to because of certain informalities. Applicants have amended claim 14 as suggested by the Examiner. Thus, the grounds for objection have been obviated and the objection is respectfully requested to be removed.

Applicants would like to thank the Examiner for the indication that Claims 4-11 are allowed.

Claim 16 stands rejected as being dependent upon a rejected base claim, but the Examiner indicated that this claim would be allowable if rewritten in independent form including the limitations of the base claim and intervening claims. As described below, Applicants assert that claim 16 as currently written is patentable over the cited prior art.

Independent claim 1 and dependent claims 2, 3, 12-13 and 15 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 4,767,350 to Cooper, et al. ("Cooper"), and dependent claim 14 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Cooper in view of U.S. Patent No. 5,890,930 to Gerow ("Gerow"). Applicants respectfully traverse the foregoing claim rejections. As now explained, a review and reading of Cooper makes clear that this patent does not disclose or yield Applicants' device as claimed. Applicants respectfully submit that differences in construction and arrangement exist between the device claimed in the present application and the device disclosed in Cooper that warrant the immediate withdrawal of the claim rejections on anticipation grounds. Cooper does not disclose

each element of the rejected claims, and accordingly, the Examiner has not made out a *prima facie* case of anticipation.

Cooper describes embodiments of a vibration resistant (as opposed to pressure-tight) electrical connector assembly including a plug and receptacle. The receptacle includes a housing and is mountable to a bulkhead wall. Rows of pin terminals extend from a recessed cavity of the receptacle. The receptacle has a right-angled configuration such that the pins extending therefrom interconnect with a printed circuit board. A gasket is disposed between the bulkhead wall and the mating face of the receptacle. The receptacle is fastened against the gasket to the bulkhead wall. The plug includes socket contacts mounted therein, and is constructed and arranged to be received in the receptacle through an opening in the bulkhead wall. Fastener means extend through holes in the plug, through apertures in the bulkhead wall, and into plug mounts to hold the receptacle and plug together.

There is no indication in Cooper that the described housing (i.e., the type generally used with computers) is in any way a pressure-tight housing as is recited in independent claim 1. Additionally, Applicants respectfully submit that Cooper neither describes nor yields the pressure-tight structure of the device according to the present invention as claimed in independent claim 1 of the present application, both as filed and now amended. Moreover, Cooper nowhere teaches or suggests the arrangement of the contact tab in electrical contact with the contact pin extending through the insulator as recited in claim 1. Indeed, it is precisely this arrangement recited in claim 1 that formed the basis for the Examiner's having found allowable subject matter in claim 4, which, after being rewritten in independent form, has now been allowed (*See* Office Action dated November 26, 2004 at 3).

Applicants respectfully traverse the Examiner's interpretation of Cooper as disclosing the contact tab according to the present invention (element 6 in Fig. 1) in the socket contact (510) of the Cooper assembly. Contact (510) of Cooper, which is an element of the

Cooper *plug* assembly (400), is clearly not relevant to the contact tab of the present invention which is part of the *socket* element. Accordingly, claim 1 of the present application recites features and structure nowhere found in the Cooper reference, and thus Cooper cannot anticipate claim 1.

The Federal Circuit has instructed that anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. *See W.L. Gore & Assocs. v. Garlock, Inc.*, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 841 (1984); *see also Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984) (requiring that the prior art reference disclose each element of the claimed invention arranged as in the claim). Considering that the device of the present invention as claimed in independent claim 1 differs in structure and arrangement from the device disclosed in Cooper, as provided above, it is respectfully submitted that the Examiner has not made a *prima facie* case of anticipation, and that claim 1 is thus patentable over Cooper. Notice to this effect is earnestly requested.

It is further submitted that dependent claims 3, 12-13 and 15-16 are also allowable by reason of their various dependencies from independent claim 1, as well as for the additional features and structure recited therein. Notice to this effect is also earnestly requested.

Gerow, cited by the Examiner in combination with Cooper in rejecting claim 14, describes embodiments of a field-replaceable connector including a shell (20), a main insulator (22) within the shell and main contacts (24) in the main insulator having socket front ends (30). An insert module (32) includes an insert insulator (36) and insert contacts (38) with pin-type rear ends. The insert module is inserted into the shell of the connector to mate with the main contacts. If the front ends (40) of the insert contacts are damaged, the connector can be repaired in the field by merely removing the first module and replacing it with another module. A

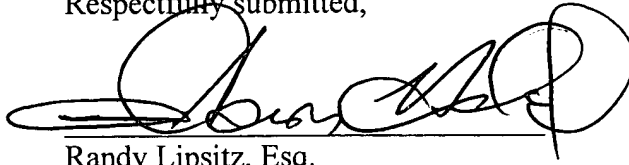
connector system according to Gerow includes a second field replaceable connector which is mateable with the first one, and which is of corresponding construction.

Regarding the rejection of dependent claim 14 as obvious over the combination of Cooper and Gerow, Applicants respectfully submit that Gerow does not overcome the severe deficiencies of Cooper as argued with respect to independent claim 1. Thus claim 14 is respectfully asserted as allowable over the cited combination of references by virtue of its dependency from claim 1, as well as for the additional features recited therein. Applicants fail to understand the Examiner's reliance on Gerow for its asserted disclosure of projections extending from the contact pin for retaining the pin in the insulator. Applicants' reading of Gerow indicates no disclosure of such projections anywhere in Gerow. Thus, Applicants assert that the Examiner has the burden to specifically identify where such a description of such pin projections (as opposed to projections from the insulator passages (26)) can be found in order to substantiate the Section 103 rejection.

On the basis of the foregoing amendments and remarks, Applicants respectfully submit that this application is in condition for immediate allowance, and notice to this effect is respectfully requested. The Examiner is invited to contact Applicants' undersigned attorneys at the telephone number set forth below if it will advance the prosecution of this case.

No fee is believed due with this Response. Please charge any fee deficiency to  
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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Randy Lipsitz", written over a horizontal line.

Randy Lipsitz, Esq.

Registration No. 29,189

Richard L. Moss, Esq.

Registration No. 39,782

Aaron S. Haleva, Esq.

Reg. No. 44,733

Attorneys for Applicants

KRAMER LEVIN NAFTALIS & FRANKEL LLP

1177 Avenue of the Americas

New York, New York 10036

(212) 715-9100